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12 Attorneys for Defendant  
13 ROKID, INC.

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA

16 JUN FU,

17 Plaintiff,

18 v.

19 ROKID, INC., and DOES 1-25,  
20 Defendants.

Case No. \_\_\_\_\_

**DECLARATION OF LIANG GUAN  
IN SUPPORT OF DEFENDANT ROKID,  
INC.'S REMOVAL OF ACTION TO  
THE UNITED STATES DISTRICT  
COURT FOR THE NORTHERN  
DISTRICT OF CALIFORNIA  
PURSUANT TO 28 U.S.C. §§ 1332 AND  
1441 (DIVERSITY)**

21 I, LIANG GUAN, declare and state as follows:

22 1. I am over the age of 18 years old. I make this declaration in support of Defendant  
23 ROKID, INC.'s Notice of Removal of Action. The following is based on my personal knowledge,  
24 and if called as a witness, I could and would competently testify to the facts contained herein.

25 2. I am General Manager for Defendant Rokid, Inc. ("Rokid"). I have served in this  
26 role since March 2023, prior to which I have served in other senior-level roles since my hire in July  
27 2016. In my capacity as Rokid's General Manager, I have knowledge of the manner in which  
28 Rokid maintains employee personnel files in the ordinary course of business. I also have access to  
Rokid's payroll records, including those of Jun Fu, which have been maintained by Rokid in the



1 ordinary course of business. I have reviewed the files necessary to provide the information set forth  
2 in this declaration.

3 3. Mr. Fu was an employee of Rokid from November 2021 through May 25, 2023.

4 4. At the date of his termination, Mr. Fu's annual salary was \$240,000. In addition  
5 to his salary, Mr. Fu was eligible for a bonus if he met certain performance criteria, and he received  
6 benefits from Rokid.

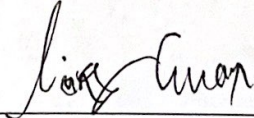
7 5. At the time of his hire, Mr. Fu informed Rokid that he resided in Minnesota, and,  
8 upon information and belief, he continues to reside there.

9 6. Attached hereto as **Exhibit A** is a true and correct copy of Mr. Fu's final pay stub  
10 showing the most recent address Mr. Fu has provided to Rokid. At the time of his termination in  
11 May 2023, based on his payroll records, Mr. Fu resided in Woodbury, Minnesota and provided  
12 Rokid with a Woodbury street address (redacted for privacy purposes).

13 7. In my capacity as General Manager, I am familiar with the corporate structure,  
14 operations, place of incorporation and organization, as well as the location of the corporate  
15 headquarters for Rokid. Rokid is incorporated under the laws of the State of California and its  
16 corporate headquarters is in Redwood City, California. As an officer/manager of the company, I  
17 direct, control, and coordinate Rokid's activities from, and maintain my office in, its Redwood City,  
18 California headquarters.

19 8. I am Rokid's registered agent, and have not received any service documents for  
20 Mr. Fu's complaint. It is therefore my understanding that Rokid has not been served in this matter.

21  
22 I declare under penalty of perjury that the foregoing is true and correct. Executed this 23rd  
23 day of August, 2023 at San Mateo, California.

24  
25   
26 \_\_\_\_\_  
27 Liang Guan  
28 General Manager  
ROKID, INC.